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ATTORNEY FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**IN RE:** §  
§  
**SUSANNE MARIE CARROLL** § **CASE NO. 17-42077-btr-13**  
§  
§  
**Debtor** § **CHAPTER 13**

**MOTION FOR CONTINUATION OF AUTOMATIC STAY**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW BEFORE THE COURT, Debtor Susanne Marie Carroll and files this her Motion for Continuation of Automatic Stay, and would respectfully show the Court the following:

1. This Court has jurisdiction over this matter pursuant to 11 U.S.C. §105 and 28 U.S.C. §1334. This matter constitutes a core proceeding pursuant to 28 U.S.C. §157(b). This Motion is additionally filed in accordance with 11 U.S.C. §362 (c)(3)(B).
2. Debtor filed the current voluntary petition for relief under Chapter 13 of Title 11 of the United States Code on 9/22/2017.
3. Debtor had previously filed a voluntary Petition for relief under Chapter 13 of the United States Code bearing the case number 12-42473-13. That case was filed on 9/7/2012, and was dismissed without prejudice on 8/23/2017.
4. Debtor's previous case was subsequently dismissed for failure to pay the Trustee that

resulted from Debtor's retirement and decreased income and at the time had increased expenses that resulted in Debtor being unable to maintain household expenses and Trustee payments..

5. A Motion for Relief was filed on behalf of Liberty National Bank, by Don Biard, Esq., 38 1st NW, Paris, TX 75460.

6. A Notice of Appearance was filed by Laurie Spindler Huffman, Esq., 2 on behalf of Lamar CAD, 2777 N. Stemmons Freeway, Suite 1000, Dallas, TX 75207; A Request for Service of Notices was filed by Ramesh Singh, Recovery Management Systems Corp, 25SE 2nd Avenue, Suite 1120, Miami, FL 33131-1605..

7. Debtor believes her financial situation will substantially improve, enabling her to complete her proposed Preliminary Chapter 13 Plan. Debtor has now been able to pay off bills and decrease ongoing expenses, and her husband's job has also stabilized with a resultant increase in income.

8. Debtor will show the Court her current case was not filed with the intent to hinder, delay or defraud her creditors.

9. Debtor understands her obligations specified under Chapter 13 Bankruptcy relief and will show the Court her financial ability to complete her proposed Plan.

WHEREFORE, PREMISES CONSIDERED, Debtor Susanne Marie Carroll respectfully requests this Court grant her request for continuance of the automatic stay concerning all scheduled creditors; and for any other relief in both law and equity as the Court may deem appropriate.

DATED: September 27, 2017

Respectfully Submitted,

LEINART LAW FIRM

By: /s/ Marcus Leinart

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ATTORNEY FOR DEBTOR

**CERTIFICATE OF SERVICE**

I hereby certify that on September 27, 2017, I did serve a true and correct copy of the foregoing to the following interested parties and to those listed on the matrix as filed with the Court, by United States Mail, First Class;

Susanne Marie Carroll  
2140 E Polk Street  
Paris, TX 75460

Office of the Standing Chapter 13 Trustee  
Carey D. Ebert - Via ECF  
500 N. Central Expressway, Suite 350  
Plano, TX 75074

United States Trustee  
110 N. College Ave, Ste 300  
Tyler, TX 75702

/s/ Marcus Leinart  
Marcus Leinart  
Attorney for Debtor

Label Matrix for local noticing Case 17-42077 Doc 5 Filed 09/27/17 Entered 09/27/17 14:22:02 Desc Main Document Page 4 of 7  
0540-4 AT&T Mobility II LLC Account Recovery Svcs  
Case 17-42077 % AT&T Services, Inc 3144 Sw 28th Ave Ste A  
Eastern District of Texas James Grudus, Esq. Amarillo, TX 79109-3169  
Sherman One AT&T Way, Room 3A218  
Wed Sep 27 14:13:16 CDT 2017 Bedminster, NJ 07921-2693

Adkins United Adkins United Finance Alliance Finance Company  
306 Clarksville St 306 Clarksville 25 NE 20th Street  
Paris, TX 75460-5932 Paris, TX 75460-5932 Paris, TX 75460-4715

American InfoSource LP as agent for Attorney General of Texas B & F Finance  
Midland Funding LLC Collections Div/ Bankruptcy Section 221 N. Broadway  
PO Box 268941 PO Box 12548 Hugo, OK 74743-3859  
Oklahoma City, OK 73126-8941 Austin, TX 78711-2548

Bay Area Credit Burns & Carlisle Burns & Carlisle Inc  
PO Box 468449 PO Box 1460 122 Lee St  
Atlanta, GA 31146-8449 Sulphur Springs, TX 75483-1460 Sulphur Springs, TX 75482-4343

CCM Enterprises CIty Finance (p)CREDIT ACCEPTANCE CORPORATION  
PO Box 781317 1559 Clarksville St. 25505 WEST 12 MILE ROAD  
Wichita, KS 67278-1317 Paris, TX 75460-6077 SOUTHFIELD MI 48034-8316

Carey D. Ebert Carey D. Ebert Susanne Marie Carroll  
500 N. Central Expressway, Suite 350 P. O. Box 941166 2140 E Polk Street  
Plano, TX 75074-6791 Plano, TX 75094-1166 Paris, TX 75460-7599

Cash Express Cash Max Cash Store  
3365 Lamar Ave 147 N. Collegiate Dr. 3848 Lamar Ave.  
Paris, TX 75460-5023 Paris, TX 75460-4842 Paris, TX 75462-5205

City Finance Colortyme Loans (p)TEXAS COMPTROLLER OF PUBLIC ACCOUNTS  
215 N Travis St 2060 Lamar Ave. REVENUE ACCOUNTING DIV - BANKRUPTCY SECTION  
Sherman, TX 75090-5922 Paris, TX 75460-4752 PO BOX 13528  
AUSTIN TX 78711-3528

Cottonwood Financial Texas, LP Cr England Credit Acceptance  
1901 Gateway Drive 4701 West 2100 Sou 25505 West Twelve Mile Rd  
Suite 200 Salt Lake City, UT 84120 Suite 3000  
Irving, TX 75038-2425 Southfield, MI 48034-8331

Credit Acceptance EZ Loan Services Edward Sloan & Associa  
PO Box 513 1455 Clarksville St PO Box 788  
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High Plains Radiological Associates  
c/o Account Recovery Services Inc  
3144 W 28th Suite A  
Amarillo, TX 79109-3169  
  
INTERNAL REVENUE SERVICE  
CENTRALIZED INSOLVENCY OPERATIONS  
PO BOX 7346  
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Attorney At Law  
P.O. Box 1398  
Sulphur Springs, TX 75483-1398

(p)JEFFERSON CAPITAL SYSTEMS LLC  
PO BOX 7999  
SAINT CLOUD MN 56302-7999

LIBERTY NATIONAL  
c/o Don Biard  
38 1st NW  
Paris, TX 75460-4103

Lamar CAD  
c/o Laurie Spindler  
Linebarger Goggan Blair & Sampson, LLP  
2323 Bryan St., Suite 1600  
Dallas, TX 75201-2637

Lamar CAD  
c/o Laurie Spindler Huffman  
Linebarger Goggan Blair & Sampson, LLP  
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231 Lamar Avenue, 2nd Floor  
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MCM  
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Los Angeles, CA 90060-0578

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Po Box 2687  
Daphne, AL 36526-2687

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San Diego, CA 92123-2255

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by American InfoSource LP as agent  
PO Box 4457  
Houston, TX 77210-4457

Midland Funding LLC by American InfoSour  
PO Box 4457  
Houston, TX 77210-4457

Noble Fin  
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Paris, TX 75460-5811

ONEMAIN FINANCIAL  
605 MUNN ROAD  
FORT MILL, SC 29715-8421

One Main Financial  
P. O. Box 70912  
Charlotte, NC 28272-0912

PRA Receivables Management, LLC  
PO Box 41021  
Norfolk, VA 23541-1021

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Suite 300B  
660 North Central Expressway  
Plano, TX 75074-6795

Portfolio Investments II LLC  
c/o Recovery Management Systems Corporat  
25 SE 2nd Avenue Suite 1120  
Miami FL 33131-1605

Quantum3 Group LLC as agent for  
Capio Partners LLC  
PO Box 788  
Kirkland, WA 98083-0788

Recovery Management Systems Corporation  
25 S.E. 2nd Avenue, Suite 1120  
Miami, FL 33131-1605

Recovery Management Systems Corporation  
25 S.E. Second Avenue  
Suite 1120  
Miami, FL 33131-1605

SECURITY FINANCE CENTRAL BANKRUPTCY  
P O BOX 1893  
SPARTANBURG SC 29304-1893

Southwestern Bell Telephone Company  
 % AT&T Services, Inc  
 James Grudus, Esq.  
 One AT&T Way, Room 3A218  
 Bedminster, NJ 07921-2693

State of Texas  
 HHS Employee Service Center  
 PO Box 6629  
 Round Rock, TX 78683-6629

Statewidecol  
 3626 N. Western  
 Oklahoma City, OK 73118-5660

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 PO Box 11509  
 Fort Worth, TX 76110-0509

Sun Loan Company  
 111 N. Broadway  
 Hugo, OK 74743-4030

Sunbelt Credit  
 201 N. Collegiate  
 Paris, TX 75460-1494

Susanne M. Carroll  
 2140 E. Polk St.  
 Paris, TX 75460-7599

Texas Alcoholic Beverage Commission  
 Licenses and Permit Division  
 PO Box 13127  
 Austin, TX 78711-3127

Texas Workforce Commission  
 TEC Building- Bankruptcy  
 101 E 15th St  
 Austin, TX 78778-0001

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 2222 Texoma Pkwy Ste 160  
 Sherman, TX 75090-2482

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 Lakewood, CO 80228-1010

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 110 N. College Ave.  
 Suite 300  
 Tyler, TX 75702-7231

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 110 North College Ave Ste 700  
 Tyler, Texas 75702-0204

United States Trustee's Office  
 110 North College Ave, Ste 300  
 Tyler, TX 75702-7231

United States Trustee- Eastern District  
 110 N. College Ave, Ste 300  
 Tyler, TX 75702-7231

Verichek  
 PO Box 3218  
 Abilene, TX 79604-3218

Verizon Wireless  
 Verizon Wireless Department/Attn: Bankru  
 PO Box 3397  
 Bloomington, IL 61702-3397

Western Finance  
 1245 Clarksville St.  
 Paris, TX 75460-6030

Western Shamrock Corporation  
 Attention: Bankruptcy  
 801 S Abe St.  
 San Angelo, TX 76903-6735

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CREDIT ACCEPTANCE CORPORATION Comptroller of Public Accounts JEFFERSON CAPITAL SYSTEMS LLC  
25505 WEST 12 MILE ROAD Revenue Accounting/ Bankruptcy Div PO BOX 7999  
SOUTHFIELD MI 48034-8316 PO Box 13528 SAINT CLOUD MN 56302-7999  
Austin, TX 78711

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Credit Acceptance Corporation

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(d)Internal Revenue Service  
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(d)PRA Receivables Management, LLC  
PO Box 41021  
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(u)Sun Loan Company

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End of Label Matrix		
Mailable recipients	85	
Bypassed recipients	7	
Total	92	